

LAW OFFICES
ROBERT & ROBERT PLLC

526 RXR PLAZA
UNIONDALE, NEW YORK 11566
(516) 832-7000
FACSIMILE (516) 832-7000

ONE GRAND CENTRAL PLACE
60 EAST 42ND STREET, SUITE 6400
NEW YORK, NEW YORK 10165*
(212) 858-9270

*NOT FOR MAIL OR SERVICE OF PROCESS

WWW.ROBERTLAW.COM

December 9, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Catherine McKoy, et al. v. Trump Corp., et al.*, No. 1:18-cv-9936 (LGS-SLC)

Dear Judge Schofield:

As you are aware, this firm along with Lewis Brisbois Bisgaard & Smith LLP represents the Defendants in the above-referenced action.¹

We write in response to the Court's Order dated December 5, 2022 (ECF 504), directing the parties to "file a letter on ECF stating their availability for trial from October 2023 to June 2024."

As we previously advised the Court in our letter dated November 30, 2022 (ECF 503), my partner and I are also counsel for Donald Trump, Jr. and Eric Trump in the matter of *People of the State of New York v. Donald J. Trump, et al.*, Index No. 452564/2022 (Sup. Ct. N.Y. County) (the "State Court Action"). In the State Court Action, the Hon. Arthur F. Engoron has ordered the trial to begin on October 2, 2023, which trial, by the New York State Attorney General's own estimation, will span approximately six to eight weeks (we believe it will go longer). As my partner and I will be required to spend significant time preparing for the trial in the State Court Action, and will be actively engaged in the State Court Action starting on October 2, 2023 until likely December 2023, we respectfully request that the trial in this matter begin no earlier than February 2024. A trial date of no earlier than February 2024 will ensure enough time for the trial in the State Court Action to conclude and allow us sufficient time to prepare for the trial in this action.

¹ Donald J. Trump, in his personal capacity ("President Trump"), is also represented by Alina Habba, Esq. of Habba Madaio & Associates, LLP.

LAW OFFICES
ROBERT & ROBERT PLLC

The Honorable Lorna G. Schofield
December 9, 2022
Page 2

Defendants' availability for a trial date in this action from "October 2023 to June 2024" is therefore anytime between February 2024 through June 2024, with Defendants' preference being a trial beginning in mid-March or Mid-April 2024.

We thank the Court for its time and attention to this action.

Respectfully submitted,

ROBERT & ROBERT PLLC

Clifford S. Robert

CLIFFORD S. ROBERT

cc: All Counsel for Record (via ECF)